

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN**

In the Matters of

**David A. and Becky S. Olsen, and
Paul E. and Cheryl R. Olsen,¹**

Case No. 10-39796-svk

Debtors.

(Jointly Administered)

DEBTORS' MOTION TO ESTABLISH A BAR DATE OF APRIL 1, 2011

The above-captioned debtors (collectively, "Debtors"), file this motion (the "Motion") pursuant to Fed. R. Bankr. P. 3003(c)(3) to set April 1, 2011 as the bar date for filing proofs of claim by creditors who must file proofs of claim pursuant to Rule 3003(c)(2) and a date for disclosing administrative expenses and claims other than those in the ordinary course of business. In support of this Motion, the Debtors state as follows:

Jurisdiction

1. The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§1334(a) and 157(a), and the order of reference filed in this district entered pursuant to § 157(a).
2. This matter is a core proceeding under 28 U.S.C. §§ 157(b)(1) and (2)(A)-(B).
3. The Debtors filed voluntary petitions for relief under Chapter 11 of the Bankruptcy Code (the "Code") on December 16, 2010 (the "Petition Date"). Orders for relief

¹ The Case Number for Paul E. and Cheryl R. Olsen is 10-39799-svk.

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were entered on the same day.

Basis for Relief

4. A bar date for the filing of proofs of claims is necessary to insure that the Debtors have adequately provided for all creditors and may move toward confirmation of a plan.

5. It is for this reason that the Debtors request that a bar date be set now, early in the case, so the Debtors may work efficiently towards resolution of a plan of reorganization.

6. The proposed bar date of April 1, 2011 allows the Debtors to determine all possible claims against them, take into account all obligations to creditors, and move toward confirmation of their plan(s) as soon as possible.

7. The proposed date satisfies the 21-day notice requirement under Rule 2002(a)(7).

8. The Debtors request that the Court enter the proposed order without hearing or further notice.

WHEREFORE, the Debtors request that the Court set April 1, 2011 as the bar date for the filing of proofs of claim for creditors who must file a proof of claim pursuant to Rule 3003(c)(2).

Dated: February 16, 2011.

/s/ Justin M. Mertz
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